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the common law (*Prentis v. Atlantic Coast Line Co.*, 211 U. S. 210, 53 L. ed. 150, 29 Sup. Ct. Rep. 67), it may confer larger powers upon a jury than those that generally prevail. Provisions making the jury judges of the law as well as of the facts in proceedings for libel are common to England and some of the states, and the controversy with regard to their powers in matters of law more generally as illustrated in *Sparf v. United States*, 156 U. S. 51, 39 L. ed. 343, 15 Sup. Ct. Rep. 273, 10 Am. Crim. Rep. 168, and *Georgia v. Brailsford*, 3 Dall. 1, 4, 1 L. ed. 483, 484, shows that the notion is not a novelty. In the present instance the plaintiff in error cannot complain that its chance to prevail upon a certain ground is diminished, when the ground might have been altogether removed."

It may surprise some of the younger members of the profession to know that until *Muscoe's case*, 86 Va., p. 443, it was an open question as to whether juries in Virginia were not in criminal cases judges of the Law as well as of the Facts.

CORRECTION.

We regret very much that there was an error in the printing of the sketch of Isaac Bonaparte Bell on page 677 of the January number. The 9th line from the bottom of the page is a repetition of the opening line of the preceding paragraph. This whole line should have been omitted and in the place thereof the following should have appeared: "He marshalled his facts with remarkable ability, applied the". Inasmuch as a reader would have difficulty in making any sense whatever of the sentence as it now stands, we make the above correction so that all interested parties can amend the text so that it will read sensibly.